

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF JEREMY BLIETZ ON BEHALF OF THE WARNER/CHAPPELL
PLAINTIFFS IN OPPOSITION TO DEFENDANTS' MOTION TO COMPEL**

I, Jeremy Blietz, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as Senior Vice President of Administration at Warner Chappell Music, Inc. I have worked in the music industry for 25 years. I have held my current position or a similar position at all times relevant to this declaration. I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at Warner Chappell Music, Inc. and could and would testify competently thereto if called as a witness.

2. I submit this declaration on behalf of Plaintiffs Warner Chappell Music, Inc., Warner-Tamerlane Publishing Corp., WB Music Corp., W.B.M. Music Corp., Unichappell Music Inc., Rightsong Music Inc., Cotillion Music, Inc., and Intersong U.S.A., Inc., (hereinafter, collectively, "Warner Chappell"). The Warner Chappell Plaintiffs are music publishing companies that exploit a diverse catalog of musical compositions.

3. I understand that this declaration is to be submitted to the Court in connection with a motion to compel (the "Motion") filed by Defendants Cox Communications, Inc. and CoxCom,

LLC (collectively, “Defendants” or “Cox”). I also understand that Cox seeks documents and information relating to termination notices Warner Chappell has received pursuant to Sections 203 or 304 of the Copyright Act (17 U.S.C. §§ 203, 304).

4. I understand that the claim period in this case ends on November 26, 2014. I also understand that under the Copyright Act a termination notice must be sent at least two years prior to the purported effective date of termination. [REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

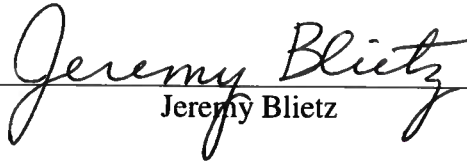
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Jeremy Blietz

Executed this 8th day of July, 2019 in Los Angeles, California.